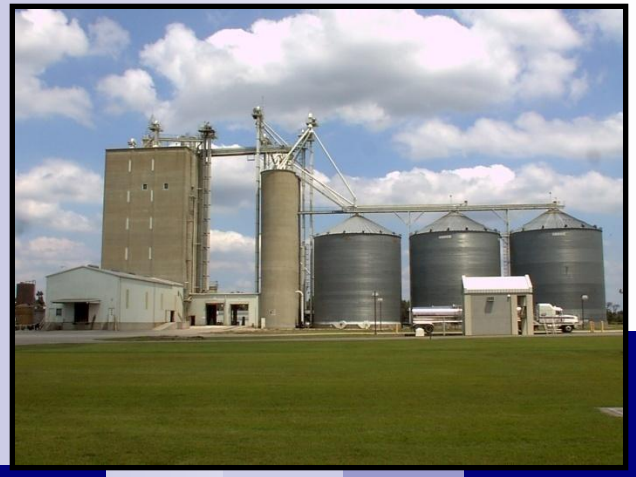


7 **DE Admin Code** 1138
Section 17

Area Source Prepared Feeds Manufacturing Facilities

Public Workshop

June 7, 2012

Blue Skies Delaware; Clean Air for Life

- **Handouts**
- **Key Definitions**
- **Acronyms**

A Brief History on the Development of Air Toxics Regulations Under the Clean Air Act

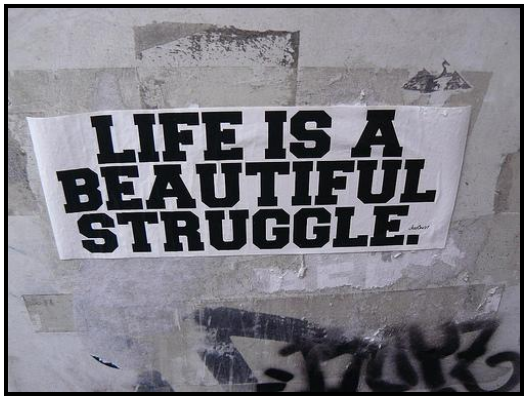
1970

- **Congress** enacts a major extension of the **Clean Air Act**
- **Establishing** the EPA and providing it with the authority to develop . . . .
  - National Ambient Air Quality Standards - **NAAQS**
  - New Source Performance Standards - **NSPS**
  - **National Emission Standards for Hazardous Air Pollutants - NESHAPS**

1970

- **Congress** directed the EPA to . . . . .
  - **Identify** toxic air pollutants (aka hazardous air pollutants or HAPs)
  - **Establish** a numerical emission limits that would protect human health from any adverse effects of hazardous air pollutants
  - **Promulgate** NESHAP rules implement those emissions limits

NESHAPS - 1973 to 1990



- Seven HAPs identified
- **21** NESHAPS promulgated

	’73 – ’80	’81 – ’85	’86 – ’90	’91 – ’92
Arsenic			3	
Asbestos		1		
Benzene		1	4	
Beryllium	2			
Mercury	1			
Radionuclides			7	1
Vinyl chloride	1			

1990

- **Congress** enacts <u>significant</u> amendments to the **Clean Air Act** that **changed** how EPA would develop and promulgate future NESHAPs

Section 112 – Hazardous Air Pollutants

Clean Air Act Amendments of 1990

- The HAPs
- Major Sources vs Area Sources
- The New NESHAP Process

Clean Air Act Amendments of 1990

- **Congress** identified ~~189~~ **187** Hazardous Air Pollutants or HAPs

List of HAPS

Acetaldehyde
Acetamide
Acetonitrile
Acetophenone
2- Acetylaminofluorene
Acrylonitrile
Allyl chloride

Cr compounds
Mn compounds

http://www.epa.gov/ttn/atw/orig189.html

Clean Air Act Amendments of 1990

- **Congress** directed the EPA
  - **To identify emission sources** of those 187 HAPs and
  - **To issue regulations in a prescribed manner** to reduce HAPs emissions from those sources

Clean Air Act Amendments of 1990

- **Congress** directed the EPA to
  - **Begin** with those industrial facilities that typically have **large HAPs emissions (**major sources**)**

Major Source for HAPs

"Major source" means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

Clean Air Act Amendments of 1990

- **Congress** directed the EPA to
  - Begin with those industrial facilities that typically have large HAPs emissions (major sources)

- **Only later, move on to** those facilities that typically have **smaller HAPs emissions (**area sources**)**

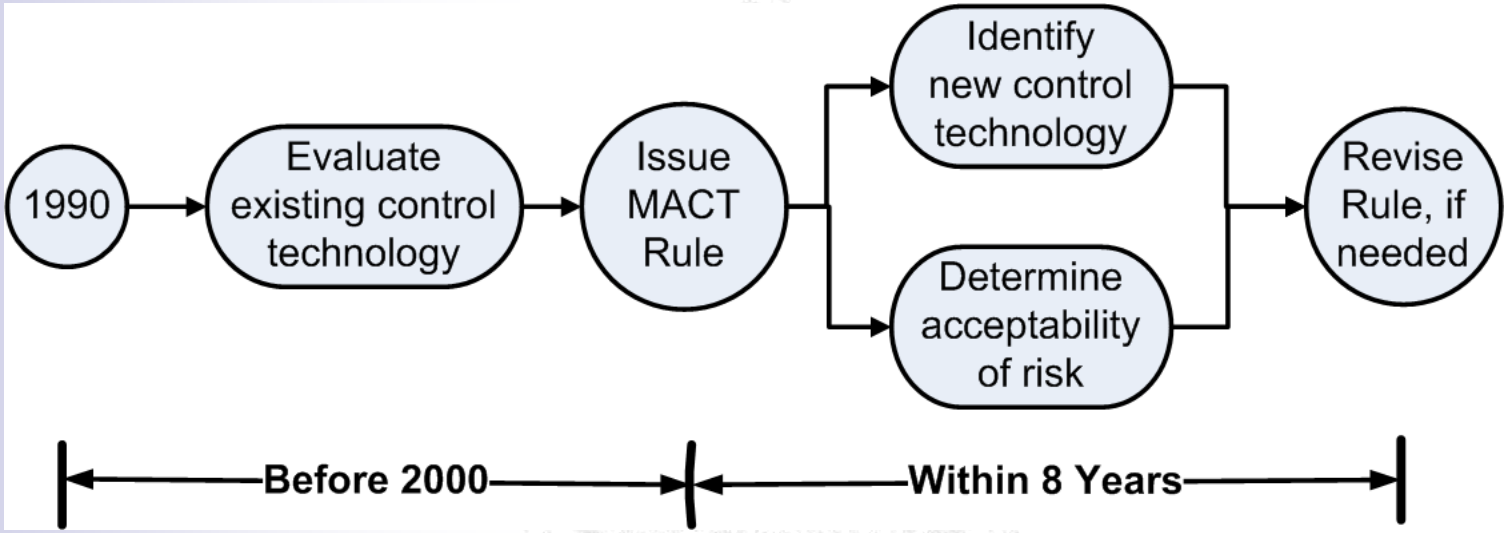
Area Source for HAPs

"Area source" means a source of hazardous air pollutants (HAPs) that is not a major source of HAPs, is not located at a major source of HAPs, and is not part of a major source of HAP emissions.

A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in aggregate, 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAPs.

Clean Air Act Amendments of 1990

- **Congress** even prescribed EPA's rule-making "path forward" to address major HAPs sources using a 2-phase approach



MACT – Maximum Achievable Control Technology

Clean Air Act Amendments of 1990

- **July 16,1992** - EPA published its initial listing of source categories predominately found at major source facilities

Including these in the Food/Agriculture Sector

- Baker's Yeast Manufacturing
- Cellulose Food Casing Manufacturing
- Manufacturing of Nutritional Yeast
- Solvent Extraction for Vegetable Oil Manufacturing
- Vegetable Oil Production

Clean Air Act Amendments of 1990

- EPA activities on major sources
  - 1993 – 2004 - EPA issued over 100 regulations addressing HAPs emissions from a wide variety of major sources
  - 2005 and on - EPA continues, but most resources have moved on to area sources

Clean Air Act Amendments of 1990

EPA's Area Source Air Toxics Program

As directed by Congress in 1990

EPA's Area Source Air Toxics Program

- **Congress** required EPA to
  - Identify 30 **HAPs** that present the greatest threat to public health
  - Identify the types of sources that account for 90% of each of the 30 **HAPs**
  - Issue regulations to reduce adverse health effects due to the emission of HAPs from these types of sources

EPA's Area Source Air Toxics Program

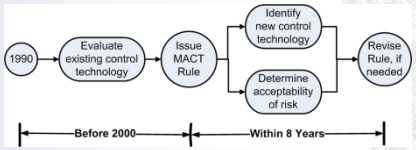
- EPA activities on area sources
  - 1999 - EPA published a listing of **33** HAPs having the greatest health impact (*in handouts*)
  - By 2002 - EPA had identified 60+ area source categories (*in handouts*)
  - 2005 - EPA began to focus more resources on regulating these area sources

33 HAPs
&
Area Source Categories

Chromium compounds
Dichloromethane
Manganese compounds
Polychlorinated biphenyls (PCBs)
Polycyclic organic matter (POM)
Quinoline
2,3,7,8-tetrachlorodibenzo-p-dioxin
1,1,2,2-tetrachloroethane
Perchloroethylene
Trichloroethylene
Vinyl chloride

EPA's Area Source Air Toxics Program

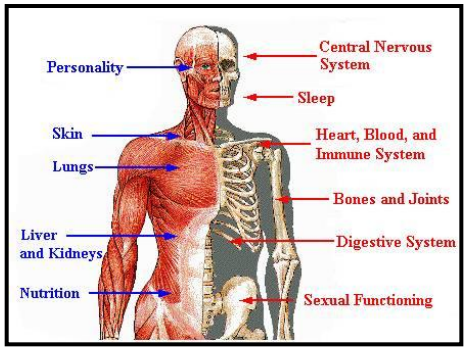
- EPA's rule-making options for area sources
  - The **MACT** Approach (Maximum Achievable Control Technology)



  - The **GACT** Approach (Generally Achievable Control Technology)

EPA's Area Source Air Toxics Program

- **Health impacts** of Cr and Mn



  - Carcinogenic Effects
    - EPA has classified some Cr+3 compounds as <u>probable</u> carcinogen (Group B1/B2)
  - Chronic Non-carcinogenic Effects
    - Respiratory system – Cr+3 and Mn
    - Central nervous system – Mn

EPA's Area Source Air Toxics Program

- On January 5, 2010, EPA issued another area source standard
  - Prepared Feeds Manufacturing at Area Sources

  - 40 CFR Part 63 Subpart DDDDDDD (Sub 7Ds)

- Federal adoptions of Area Source Standards leads to internal ***Division of Air Quality*** review

Typical Division of Air Quality Review

- Review of Federal Area Source Standards
  - Are there any Delaware sources?
  - How do the Federal requirements compare to existing Delaware air regulations?
  - Do the Federal requirements adequately meet the needs of the public, the regulated community, and the Department?
  - Are additional compliance tool or outreaches needed?

Results of Review of Sub 7Ds

- There are Delaware sources
- There are no comparable regulatory requirements in Delaware's Air Quality regulations
- There are insufficient compliance assistance tools and only minimal outreach materials being provided for Sub 7Ds
- The Department concluded it was appropriate to adopt Sub 7Ds under the Division of Air Quality's Area Source Air Toxics program

Which Brings

Us to

Today's

Public Workshop

Development of air toxics regulations

Workshop Objectives

During this workshop, we want to address these key questions - - -

1. Who is **subject** to Section 17?
2. Who is **exempt**?
3. What are the required **management practices**?
4. What are the **equipment** requirements?
5. How do sources **demonstrate** initial compliance?
6. What are the **monitoring** requirements?
7. What are the **paper work** requirements?
8. When must a facility be **in compliance**?
9. What are the **permitting** requirements?
10. What are the **major differences**?

1. Who is subject to Section 17? (i.e. who is an affected source)

Who is subject to Section 17?

- Prepared feed manufacturing facilities that
  - Primarily manufacture animal feed; that is, animal feed is > 50% of facility production
  - Uses "materials" that contain Cr or Mn compounds
    - "Materials" ≥ 0.1% Cr or
    - "Materials" ≥ 1.0% Mn
  - Is an area source of HAP emissions [<10/25 TPY of HAP(s)]

"Materials" is short for materials containing Cr or Mn

2. Who is exempt from Section 17?

Who is exempt from Section 17?

- Prepared feed manufacturing facility that
  - Has < 50% of its total production in animal feed
  - Does **NOT** use or **ceased** the use of "materials" that contain Cr (≥ 0.1%) or Mn (≥ 1.0%)
- Facilities that are primarily engaged in raising or feeding animals
- Facilities engaged in the growing of agricultural crops that are used in the manufacturing of animal feed

3. What are the required management practices?

Required Management Practices?

- Where "materials" are stored, used, or handled

1. Store raw "materials" in closed containers

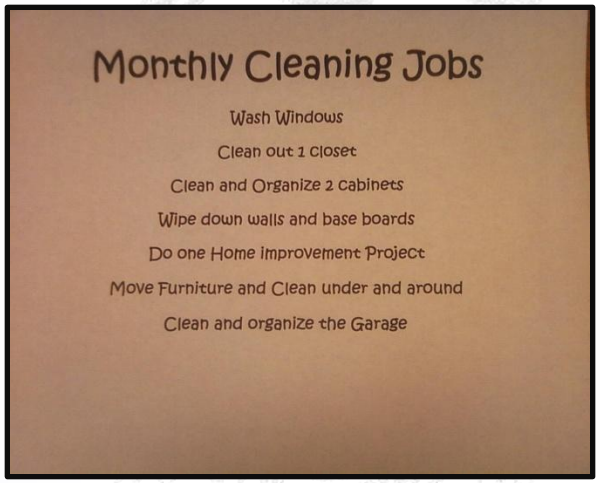
"Materials" is short for materials containing Cr or Mn

Required Management Practices?

- Where “materials” are stored, used, or handled

2. Perform housekeeping measures to minimize excess dust

Frequent vacuuming
Or sweeping



Thorough **monthly** cleaning w/low pressure air

Keep doors shut except for ingress/egress

Required Management Practices?

- Where “materials” are stored, used, or handled

BEFORE

You must keep doors shut except during normal ingress and egress

AFTER

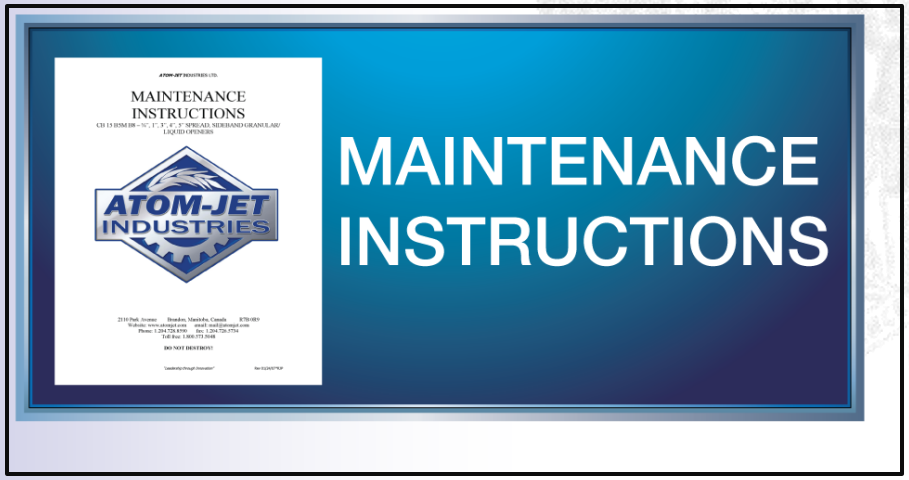
You must keep exterior doors in the immediate affected areas shut except during normal ingress and egress, as practicable. This paragraph does not apply to areas where finished product is stored in closed containers, and no other materials containing chromium or manganese are present

Keep doors shut except for ingress/egress

Required Management Practices?

- Where “materials” are stored, used or handled

3. Operate and maintain process equipment per manufacturer’s specifications and in a way to minimize excess dust creation



Required Management Practices?

- Regarding mixing operations

  - The mixer shall be covered at all times when mixing is occurring, except when adding “materials” to mixer

Required Management Practices?

- Regarding bulk loading operations

  - Use a device or any other means to lessen the distance between the loadout spout and the truck/railcar to reduce fugitive emission

Required Management Practices?

- Regarding bulk loading operations

For the bulk loading process where materials containing chromium or manganese are loaded into trucks or railcars, ...

BEFORE

you must use a device at the loadout end of each bulk loader to lessen fugitive emissions by reducing the distance between the loading arm and the truck or railcar

AFTER

you must lessen fugitive emissions by reducing the distance between the loadout spout and the vehicle being loaded by either paragraph (1) or (2) of this section.

(1) Use a device of any kind at the bulk loadout spout that minimizes the distance to the vehicle being loaded.

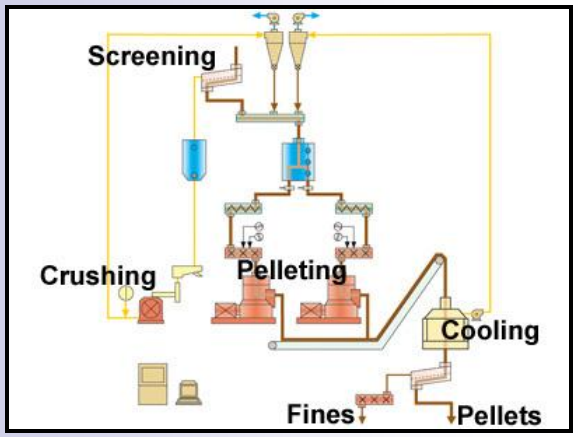
(2) Use any other means to minimize the distance between the loadout spout and the vehicle being loaded.

4. What are the equipment requirements?

Equipment Requirements?

- Regarding pelleting operations

  - If the initial ADFPL ≤ 50 tons/day, there are **NO** additional equipment requirements



Initial
1/5/11 to 1/4/12

ADFPL = Average Daily Feed Production Level

Equipment Requirements?

- Regarding pelleting operations
  - If subsequently the ADFPL > 50 tons/day,
    - Capture pelleting dust emissions and
    - Route pelleting emissions to a cyclone

ADFPL = Average Daily Feed Production Level

Equipment Requirements?

- Regarding pelleting operations
  - Requirements differ depending of the type of affected source
    - Existing source commenced construction or reconstruction on or before July 27, 2009
    - New source commenced construction or reconstruction after July 27, 2009

Equipment Requirements?

New Sources

- Regarding pelleting operations at a NEW affected source
  - If the ADFPL > 50 tons/day,
    - Capture pelleting dust emissions and
    - Route pelleting emissions to a cyclone **designed** to reduce dust emissions by ≥ 95%

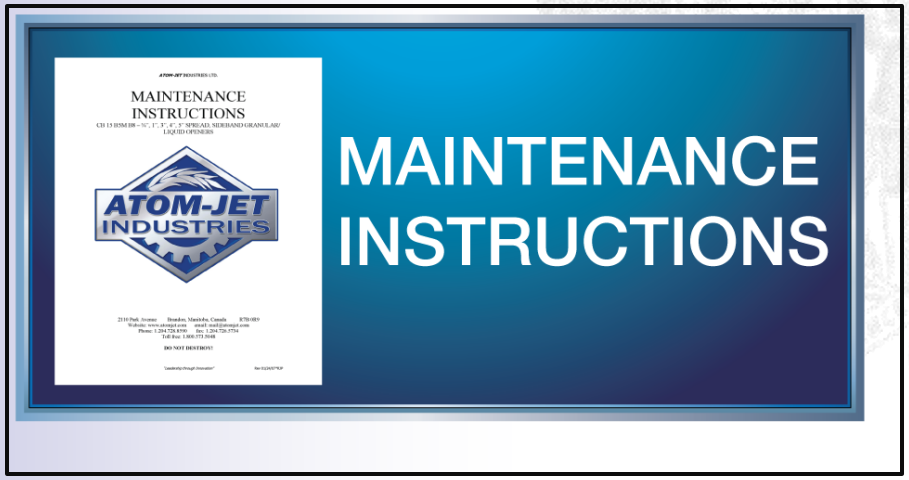
ADFPL = Average Daily Feed Production Level

Equipment Requirements?

New Sources

- Regarding pelleting operations at a NEW affected source

  - Operate and maintain **cyclone** per manufacturer's specifications

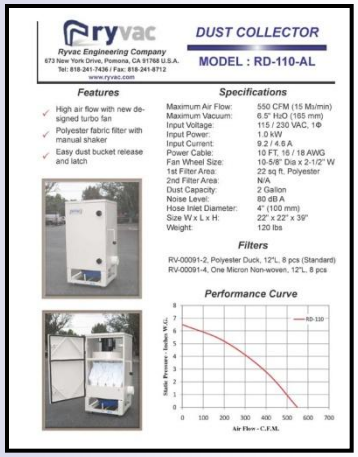


Equipment Requirements?

New Sources

- Demonstrating > 95% design

1. Manufacturer's specifications
2. Certification by profession engineer (PE) or responsible official
3. Performance test results



Equipment Requirements?

- Demonstrating > 95% design
  - Establish proper operating range that represents compliant operation of the cyclone for either of the following:

"Operating Parameter"

- Inlet flow rate
- Inlet velocity
- Pressure drop
- Fan amperage

Equipment Requirements?

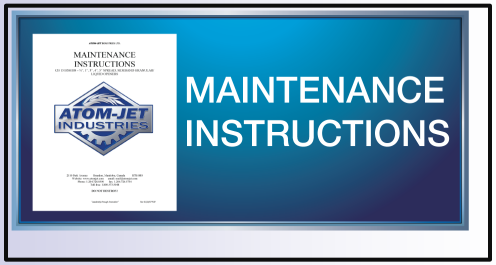
Existing Sources

- Regarding pelleting operations at a EXISTING affected source
  - If the ADFPL > 50 tons/day,
    - Capture pelleting dust emissions and
    - Route pelleting emissions to a cyclone ~~designed to reduce dust emissions by ≥ 95%~~

ADFPL = Average Daily Feed Production Level

Equipment Requirements?

- Regarding pelleting operations
  - Operate and maintain **cyclone** per manufacturer's specifications and operating instructions
  - Good air pollution control practices



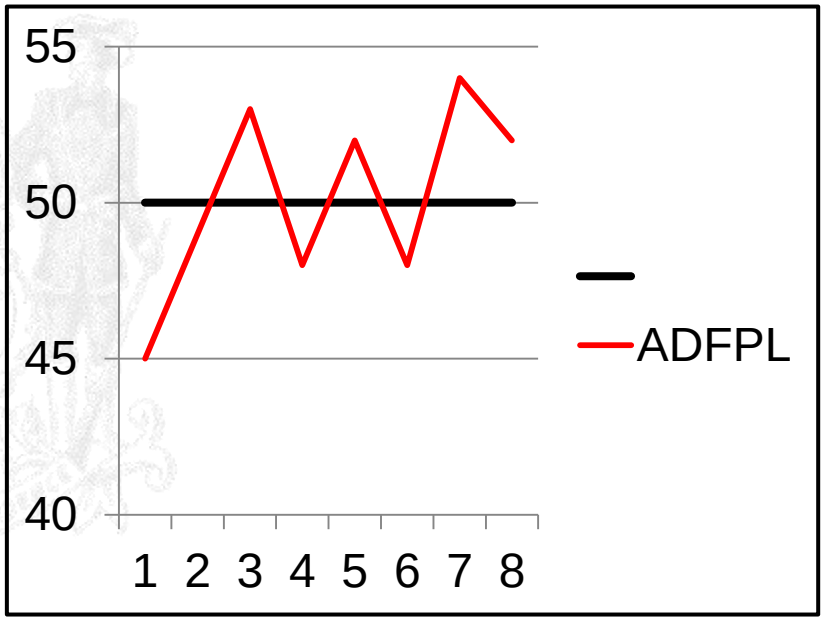
Equipment Requirements?

New & Existing Sources

- Regarding ALL pelleting operations

  - **ONCE IN – ALWAYS IN** (DE requirement)

17.8.7 [Reserved]. ~~63.11624(b)(7) If you own or operate an affected source that was subject to the requirement in § 63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations, notification if your average daily feed production level for the previous year was 50 tpd or less and that you are no longer complying with § 63.11621(e) or (f).~~



5. How do sources demonstrate initial compliance?

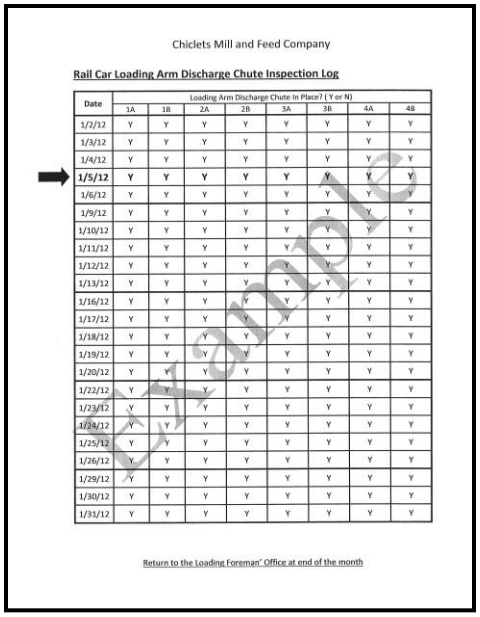
- Existing affected sources
- New affected source

Demonstrate Initial Compliance?

New & Existing Sources

- Devices on bulk loaders
  - On compliance date, document
    - proper installation and
    - good operating condition

  of a device or any other means to lessen distance between each loadout spout and vehicle being loaded



Chiclets Mill and Feed Company

Rail Car Loading Arm Discharge Chute Inspection Log

Date	Loading Arm Discharge Chute In Place? (Y or N)							
	1A	1B	2A	2B	3A	3B	4A	4B
1/2/12	Y	Y	Y	Y	Y	Y	Y	Y
1/3/12	Y	Y	Y	Y	Y	Y	Y	Y
1/4/12	Y	Y	Y	Y	Y	Y	Y	Y
1/5/12	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**
1/6/12	Y	Y	Y	Y	Y	Y	Y	Y
1/9/12	Y	Y	Y	Y	Y	Y	Y	Y
1/10/12	Y	Y	Y	Y	Y	Y	Y	Y
1/11/12	Y	Y	Y	Y	Y	Y	Y	Y
1/12/12	Y	Y	Y	Y	Y	Y	Y	Y
1/13/12	Y	Y	Y	Y	Y	Y	Y	Y
1/16/12	Y	Y	Y	Y	Y	Y	Y	Y
1/17/12	Y	Y	Y	Y	Y	Y	Y	Y
1/18/12	Y	Y	Y	Y	Y	Y	Y	Y
1/19/12	Y	Y	Y	Y	Y	Y	Y	Y
1/20/12	Y	Y	Y	Y	Y	Y	Y	Y
1/22/12	Y	Y	Y	Y	Y	Y	Y	Y
1/23/12	Y	Y	Y	Y	Y	Y	Y	Y
1/24/12	Y	Y	Y	Y	Y	Y	Y	Y
1/25/12	Y	Y	Y	Y	Y	Y	Y	Y
1/26/12	Y	Y	Y	Y	Y	Y	Y	Y
1/29/12	Y	Y	Y	Y	Y	Y	Y	Y
1/30/12	Y	Y	Y	Y	Y	Y	Y	Y
1/31/12	Y	Y	Y	Y	Y	Y	Y	Y

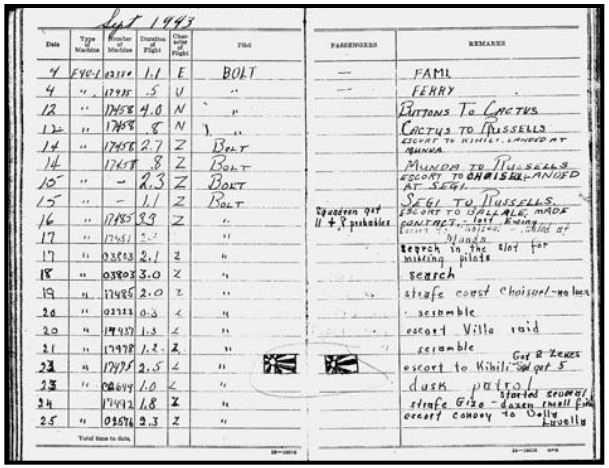
Return to the Loading Foreman' Office at end of the month

Example

Demonstrate Initial Compliance?

Existing Sources

- Cyclone on pelleting operation, **if required**
  - On compliance date, document cyclone is being operated and maintained in accordance with
    - manufacturer's specifications & operating instructions and
    - good air pollution control practices



Demonstrate Initial Compliance?

New Sources

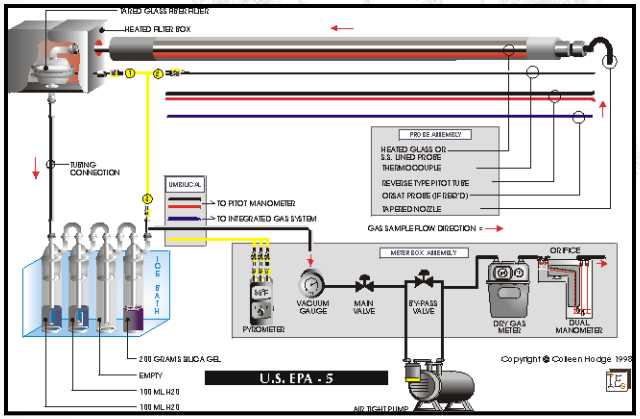
- Cyclone on pelleting operation, **if required and using either manufacturer's specifications or PE's certification**
  - On compliance date, document
    - ≥ 95% efficiency of cyclone
    - Operating in the prescribed "operating range"
    - Operating and maintaining in accordance with the manufacturer's specifications

Demonstrate Initial Compliance?

New Sources

- Cyclone on pelleting operation, **if required**
  - **Performance testing**

- Use Method 5 of Appendix A [Part 60]
- 3 runs at inlet and outlet of cyclone
- Sampling time ≥ 60 minutes/run
- Sampling volume ≥ 30 dscf/run



THEN

Demonstrate Initial Compliance?

New Sources

- Cyclone on pelleting operation, **if required**
  - Performance testing - *Continued*
    - Calculate the particulate reduction efficiency

$$\text{Particulate Reduction} = \frac{\text{Mass}_{\text{inlet}} - \text{Mass}_{\text{outlet}}}{\text{Mass}_{\text{inlet}}} \times 100$$

    - Record “operating parameter” during all runs

6. What are the monitoring requirements?

- Equipment Inspections
- Operating parameters

Equipment
Inspection
Monitoring

- Monthly Bulk Loadout Operations – All sources
- Quarterly Cyclone – All sources
- Weekly Cyclone – Existing sources only

Monitoring Requirements?

All Sources

- Inspect devices on load out end of bulk loader
  - Performs monthly inspection to ensure each device or other means used is in proper working condition
  - Records the results of inspection
    - Name of inspector
    - Date, time, and place of inspection
    - If a corrective action is required, the cause, the corrective action, and the time duration before proper operation was restored

Monitoring Requirements?

All Sources

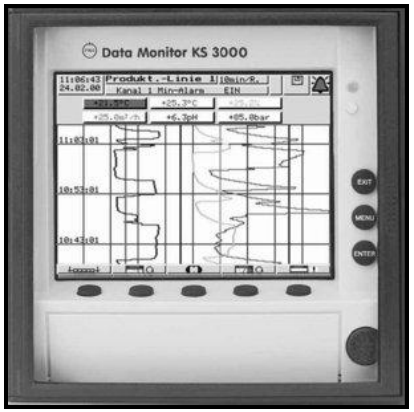
- Inspect cyclone on pelleting operation
  - Performs quarterly inspection looking for . . .
    - Corrosion
    - Erosion
    - Other damage

  - Records the results of inspection
    - Same as for monthly inspection of load out arm devices

Monitoring Requirements?

- Inspect OPERATING cyclone
  - Performs weekly visual inspection to ensure consistent with . . .
    - Good air pollution control practices
    - Manufacturer's specifications
    - Manufacturer's operating instructions
  - Records the results of inspection
    - Same as for monthly inspection of load out arm devices

Operating Parameter Monitoring



Monitoring Requirements?

New Sources

- Monitor cyclone operating parameter
  - Monitor and record the “operating parameter” at least once daily, when the pelleting process is in operation
    - Inlet flow rate
    - Inlet velocity
    - Pressure drop
    - Fan amperage

7. What are the paper work requirements?

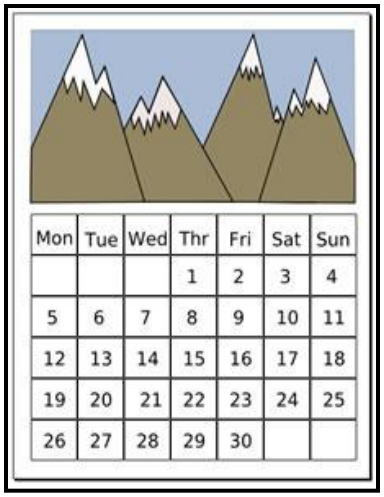
- Notifications
- Annual reports
- Record keeping

Notification requirements

- Initial notification
- Notification of compliance status
- Notification of change of status
- Notification of performance test

Initial Notification

- **Submit** an "Initial Notification" by the applicable date
  - Existing affected sources – Oct. 11, 2012
  - New or reconstructed affected sources – Oct. 11, 2012 or within 120 days of startup, whichever is later
  - If an unaffected source becomes an "affected source" after normal compliance date, within 120 days of becoming an "affected source"



Initial Notification

- **Submit** to the Department with a copy to EPA Region 3
- **Submittal** must contain the information listed in **17.7.1.1 thru 17.7.1.5** of Section 17
- **Submittal is Optional – If** the O/O submitted the Federal Sub 7D "Initial Notification" to EPA by May 5, 2010 and sent a copy to the Department

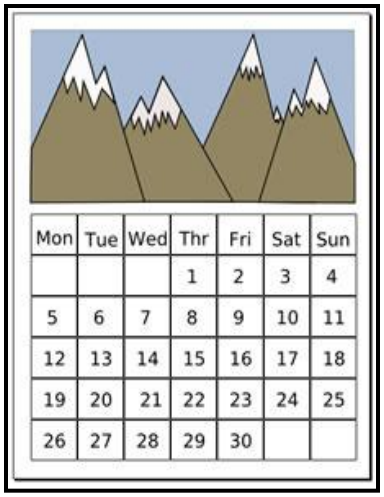
Initial Notification

Example

The owner or operator of an affected source shall submit an initial notification by October 11, 2011 or not later than 120 calendar days after the source becomes subject to Section 17, whichever is later, in accordance with 17.7.1 of this regulation.

Notification of Compliance Status (NOCS)

- **Submit** a "Notification of Compliance Status" by the applicable date
  - Existing sources – Oct. 11, 2012
  - New or reconstructed sources – Oct. 11, 2012 or within 120 days of start up, whichever is later



  - Sources electing to conduct a performance test – within 60 days of the completion of testing
  - If an unaffected source becomes an "affected source" after normal compliance date, within 120 days of becoming an "affected source"

Notification of Compliance Status (NOCS)

- **Submit** to the Department with a copy to EPA Region 3
- **Submittal** must contain the applicable information listed in **17.7.2.1 thru 17.7.2.5** of Section 17
- **Submittal** must also include the performance test results
- **Submittal is Optional – If** the O/O submitted the Federal Sub 7D "Notification of Compliance Status" to EPA by May 4, 2012 and sent a copy to the Department

NOCS Existing

The owner or operator of an existing affected source shall submit a notification of compliance status no later than October 11, 2012.

The owner or operator of a new or reconstructed affected sources shall submit a notification of compliance status no later than October 11, 2012 or 120 days after startup, whichever is later.

Example

NOCS New

The owner or operator of an existing affected source shall submit a notification of compliance status no later than October 11, 2012.

Example

Notification of Change of Status (NOCOS)

- **Submit** a "Notification of Change of Status" as soon as practicable after the "affected source" ceases to use any "materials" containing Cr and Mn compounds
- **Submit** to the Department with a copy to EPA Region 3
- **Submittal** must contain the information listed in **17.7.3.1 and 17.7.3.2** of Section 17

Note: The facility remains an "affected source" until the submittal of the **NOCOS**

NOCOS

Example

The owner or operator of an affected source that ceases to use any materials containing chromium compounds or materials containing manganese compounds shall submit an a notification of change of status in accordance with 17.7.3 of this regulation.

Notification of Performance Test, if elected

- **Submit** a "Notification of Intent to Conduct a Performance Test" no later than 60 days prior to testing
- **Submit** to the Department with a copy to EPA Region 3
- **Submittal** must contain the information listed in **3.7.2.1** and **3.9.5** of Section 3
- **Sources should expect** the Department to - - -
  - Request and review the site-specific performance test plan
  - Issue an approval or disapproval of the test plan in timely manner
  - Have an observer present during the performance test

Notification of Performance Test

Example

If the source is required to conduct a performance test, the owner or operator of an affected source shall submit to the Department a notification of the owner or operator's intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin .

Reporting requirements

- **Annual Compliance Certification**

Compliance Certification Report (ACCR)

- **Prepare** "Annual Compliance Certification Report" for the previous reporting calendar year prior to March 1
- The **"ACCR"** must contain the applicable information listed in **17.8.1 thru 17.8.6** of Section 17
- The **"ACCR"** does not need to be submitted if there were no deviations or the source did not exceed 50 TPD for the first time during the previous calendar year

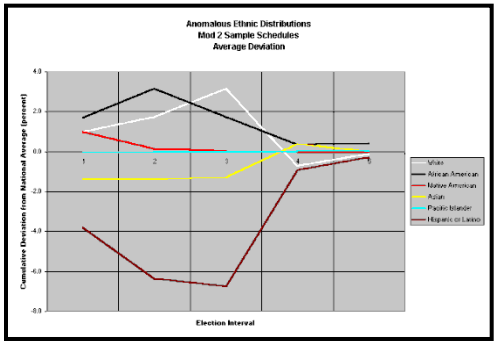
ACCR

Example

By March 1 of each year, the owner or operator of an affected source shall prepare an annual compliance certification report for the previous calendar year containing the information specified in 17.8.1 through 17.8.6 of this regulation.

If a deviation occurred during the previous calendar year as reported in accordance with 17.8.3, 17.8.4, or 17.8.5 of this regulation or if a change occurred under 17.8.6 of this regulation, the owner or operator shall submit the annual compliance certification report for the previous calendar year by March 1.

What is a deviation?



Examples

- Failure to perform or improperly perform the management practices
  - Housekeeping measures to minimize excess dusting
  - Maintain and operate all process equipment and control devices in accordance with the manufacturer's specifications or recommendations
  - Closed mixer and storage containers
- Failure to perform or improperly perform an inspection
- Operating pelleting equipment when the cyclone's operating parameter is outside the establish compliant range of values

Compliance Certification Report (ACCR)

- "Annual Compliance Certification Report" **must be submitted** by March 1, if
  - There was a deviation identified under either **17.8.3, 17.8.4, or 17.8.5**

    Or
  - The calculated average daily feed production level for the previous year exceeded 50 TPD **for the first time**
- **Submit** to the Department with a copy to EPA Region 3

Where are the Notifications/Reports Sent?

Delaware DNREC
Director of Air Quality
Blue Hen Corporate Center
655 S Bay Road, Suite 5N
Dover, DE 19901

<u>With a copy to</u>
U. S. Environmental Protection Agency
Director, Air Protection Division
1650 Arch Street
Philadelphia, PA 19103

Recordkeeping requirements

Recordkeeping

- **Maintain** all applicable records and information listed in **17.9.1.1 thru 17.9.1.6** for at least 5 years

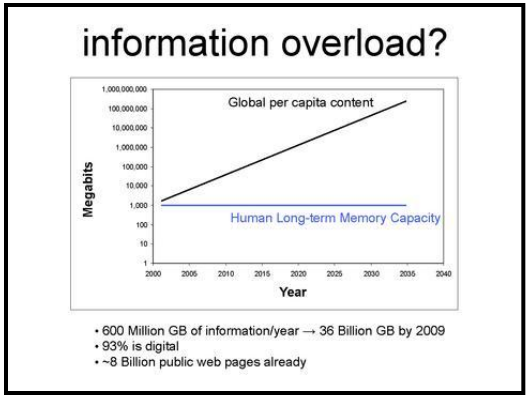
  Examples include

- Copies of all notifications and reports and the records and information associated with their preparation, including performance test results, if required

- Cyclone records associated with . . .
  - Quarterly/Weekly inspections
  - Manufacturer's specifications/ recommendations for operations and maintenance
  - Certification of ≥95% efficiency
  - Daily monitoring of operating parameter

Recordkeeping

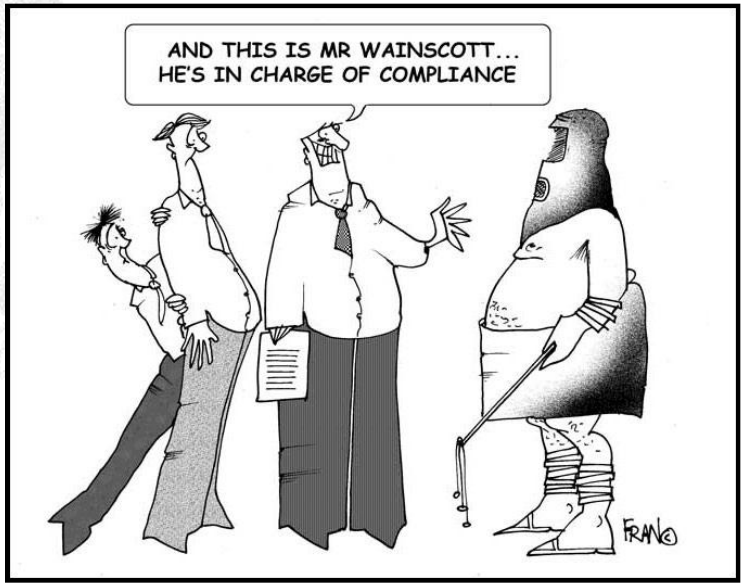
- Records associated with initial and annual average feed production level determinations
- Records associated with each occurrence of a deviation from . . .
  - Management practices
  - Inspections
  - Established operating parameters
  - Other requirements of Section 17
- Records associated with the corrective actions take when a deviation occurred



8. When must a facility be in compliance?

When must a facility be in compliance?

- Existing affected sources must be in compliance no later that October 11, 2012
- New affected sources must be in compliance not later than October 11, 2012 or upon initial startup, whichever is later
- A source that exceeds 50 TPY annual "ADFPL" for the first time since January 5, 2011 must be in compliance no later than July 1 of the following year



9. What are the permitting requirements?

What are the permitting requirements?

- Prepared feed manufacturing facilities subject to Section 17 continue to be SUBJECT to permitting requirements under 7 **DE Admin Code** 1102

- Prepared feed manufacturing facilities subject to Section 17 are exempt from Title V permitting requirements, **IF** the source is not otherwise required to obtain a Title V permit under 3.1 of 7 **DE Admin Code** 1130

10. What are the major differences?

Sub 7Ds/Section 17 - Notable Differences

- An “affected source” that stops using “materials” remains an “affected source” until the submittal of NOCOS to the Department (17.1.3.2)

- An “affected source” that is required to install, operate, and maintain a cyclone on the pelleting operation remains an “affected source”, even if a subsequent calendar year ADFPL falls to 50 TPD or less (17.3.4 and 17.8.7)

- An “affected source” whose calendar year ADFPL exceeds 50 TPD for the first time since the initial determination must submit the ACCR by March 1, even if there were no deviations (17.8 and 17.8.6)


Other Stuff

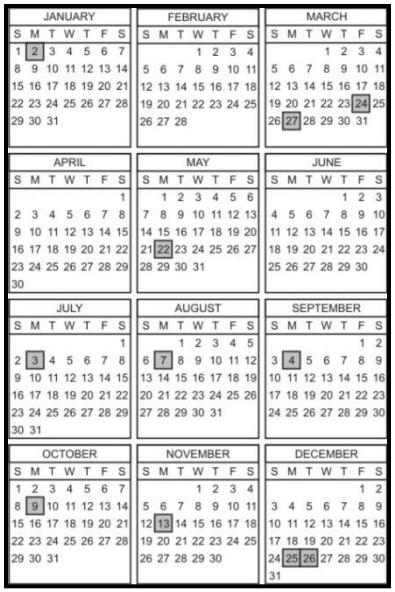
Compliance Assistance Tools Available

- Initial notification
- Notification of compliance status
- Notification of change of status
- Notification of performance test
- **Annual compliance certification report**

FORMS With Instructions

www.dnrec.delaware.gov/whs/awm/Info/Regs/Pages/Section17.aspx

Expected Path Forward



- Publish <u>proposed</u> regulation in Delaware Register of Regulation – August 1, 2012
- Public hearing – August 22, 2012
- Publish <u>final</u> regulation in Delaware Register of Regulation – October 1, 2012
- Regulation effective date – October 11, 2012

Workshop Objectives

1. Who is **subject** to Section 17?
2. Who is **exempt**?
3. What are the required **management practices**?
4. What are the **equipmen**t requirements?
5. How do sources **demonstrate** initial compliance?
6. What are the **monitoring** requirements?
7. What are the **paper work** requirements?
8. When must a facility be **in compliance**?
9. What are the **permitting** requirements?
10. What are the **major differences**?

For More Information on Section 17

- Contact Jim Snead
  - (302) 323-4542
  - james.snead@state.de.us
- Contact Melanie and Tom

For the latest information,
follow the ongoing development on
Section 17 Regulatory Web Page

www.dnrec.delaware.gov/whs/awm/Info/Regs/Pages/Section17.aspx